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6 Attorneys for Defendant
BACKGROUNDCHECKS.COM

8 UNITED STATES DISTRICT COURT
9 DISTRICT OF NEVADA

10 Keith White,

11 Plaintiff,

12 v.

13 Experian Information Solutions, Inc.; National
Consumer Telecom & Utilities Exchange, Inc.;
14 Innovis Data Solutions, Inc.; Clarity Services,
Inc.; Backgroundchecks.com, LLC; LoanMart;
Synchrony Financial and WebBank,

15 Defendants.
16

Case No. 2:24-cv-00533-JCM-NJK

**STIPULATION TO EXTEND TIME FOR
DEFENDANT
BACKGROUNDCHECKS.COM LLC TO
FILE RESPONSIVE PLEADING TO
PLAINTIFF'S COMPLAINT**

[FIRST REQUEST]

17 Plaintiff KEITH WHITE ("Plaintiff") and Defendant BACKGROUNDCHECKS.COM LLC
18 ("Defendant"), by and through their undersigned counsel, hereby agree and stipulate to extend the time
19 for Defendant to file a response to the Complaint from the current deadline of April 12, 2024, up to
20 and including **May 3, 2024**.

21 The requested extension is necessary in light of the fact that Defendant's counsel was recently
22 retained. The additional time will allow defense counsel to conduct a complete investigation into the
23 allegations and to prepare a response to the Complaint.

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1 This is the first request for an extension of time to respond to the Complaint. This request is
2 made in good faith and not for the purpose of delay.

3
4 Dated: April 12, 2024

Dated: April 12, 2024

5 Respectfully submitted,

Respectfully submitted,

6
7 /s/ Gerardo Avalos
George Haines, Esq.
Gerardo Avalos, Esq
8 FREEDOM LAW FIRM, LLC

/s/ Diana G. Dickinson
Diana G. Dickinson, Esq.
LITTLER MENDELSON, P.C.

9 *Attorneys for Plaintiff*
10 KEITH WHITE

Attorney for Defendant
BACKGROUNDCHECKS.COM LLC

11 **IT IS SO ORDERED.**

12 Dated: April 15, 2024

13
14
15 4870-2209-7078.1 / 107811-1036

16 
Nancy J. Koppe
United States Magistrate Judge